

QUAN-EN YANG, et al.
On His Own Behalf and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

G & C GULF, INC. d/b/a
G&G TOWING

Defendant.

* IN THE

* CIRCUIT COURT

* FOR

* MONTGOMERY COUNTY, MD.

* Case No. 403885-V

* Hon. Ronald B. Rubin

* Specially Assigned

* TRACK VI

* * * * *

AFFIDAVIT OF SERVICE

I, Catherine Stuckrath, state as follows:

1. I am a competent person over the age of eighteen and not a party to the case.
2. On September 1, 2015 I served Subpoenas together with Notices of Deposition Duces Tecum and Attachment A by certified mail to the following deponents:

Torin Andrews
 Andrews & Lawrence Law Group LLC
 9639 Doctor Perry Rd., Suite 208
 Ijamsville, MD 21754
 Resident Agent for:

- Decoverly IV Condominium, Inc.

Jeff Gatling
 The Management Group Associates
 20440 Century Blvd.
 Suite 100
 Germantown, MD 20874
 Resident Agent for:

- Fountain Hills Community Association, Inc.

K. David Meit
 15245 Shady Grove Rd.
 Suite 160
 Rockville, MD 20850
 Resident Agent for:

- Kensington Shopping Center
 c/o Oculus Realty, LLC

Cheryl Berger
 Association Bookkeeping Services
 849-F Quince Orchard Blvd.
 Gaithersburg, MD 20878
 Resident Agent for:

- Wedgewood Court Townhouses Homeowners Association No. 2, Inc.

RECEIVED
 SEP 15 2015
 Clerk of the Circuit Court
 Montgomery County, Md.

Kathy Drury, Secretary
20440 Century Blvd.
Suite 100
Germantown, MD 20874

12070-7000 (Subpoena Dept.)
15000 Capital One Drive
Richmond, VA 23238-1119

- Middlebrook Commons
Homeowners Association
c/o The Management Group
Associates, Inc.
- Capital One Bank (USA)

3. A copy of the process for each deponent is attached hereto.
4. I do solemnly swear under the penalties of perjury that the statements made herein are true to the best of my knowledge, information and belief.

Date: 09-11-15



Catherine Stuckrath
102 W. Pennsylvania Ave. Suite 402
Towson, MD 21204
410-825-2300

CERTIFICATE OF SERVICE

I hereby certify, this 11th day of September 2015 that I served a copy of the foregoing

Affidavit of Service via first class mail, postage prepaid on:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Capital One Bank (USA)

Issue Date: 08/26/2015

Name
15000 Capital One Drive

Service Deadline: 60 days after Issue Date.

Address
Richmond, VA 23238-1119

SUBPOENA

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address

Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	
	*	FOR
Plaintiff,	*	
vs.	*	MONTGOMERY COUNTY, MD.
	*	
G & C GULF, INC. d/b/a	*	Case No. 403885-V
G&G TOWING	*	
	*	Hon. Ronald B. Rubin
Defendant.	*	Specially Assigned
	*	TRACK VI
* * * * *		

NOTICE OF DEPOSITION OF CAPITAL ONE BANK (USA)
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Capital One Bank (USA)
 Serve on: 12070-7000 (Subpoena Dept.)
 15000 Capital One Drive
 Richmond, VA 23238-1119

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 1st day of September 2015 that I served a copy of the foregoing
Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Wedgewood Court Townhouses HOA No.2, Inc.

Issue Date: 08/26/2015

Name
849-F Quince Orchard Blvd.

Service Deadline: 60 days after Issue Date.

Address
Gaithersburg, MD 20878

City, County, State, Zip

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

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If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
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3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.
On His Own Behalf and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

G & C GULF, INC. d/b/a
G&G TOWING

Defendant.

* IN THE
* CIRCUIT COURT
* FOR
* MONTGOMERY COUNTY, MD.
* Case No. 403885-V
* Hon. Ronald B. Rubin
* Specially Assigned
* TRACK VI

* * * * *

NOTICE OF DEPOSITION OF WEDGEWOOD COURT TOWNHOUSES
HOMEOWNERS ASSOCIATION NO. 2, INC.
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Wedgewood Court Townhouses
Homeowners Association No. 2, Inc.
Serve on: Cheryl Berger
Association Bookkeeping Services
849-F Quince Orchard Blvd.
Gaithersburg, MD 20878

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 1st day of September 2015 that I served a copy of the foregoing
Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND

or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Fountain Hills Community Association, Inc.

Issue Date: 08/26/2015

Name
20440 Century Blvd., Suite 100

Service Deadline: 60 days after Issue Date.

Address
Germantown, MD 20874

SUBPOENA

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015 at 10:00 a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
 Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.
On His Own Behalf and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

G & C GULF, INC. d/b/a
G&G TOWING

Defendant.

* IN THE
* CIRCUIT COURT
* FOR
* MONTGOMERY COUNTY, MD.
* Case No. 403885-V
* Hon. Ronald B. Rubin
* Specially Assigned
* TRACK VI

* * * * *

**NOTICE OF DEPOSITION OF FOUNTAIN HILLS
COMMUNITY ASSOCIATION, INC.
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Fountain Hills
Community Association, Inc.
Serve on: Jeff Gatling
The Management Group Associates
20440 Century Blvd.
Suite 100
Germantown, MD 20874

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 1st day of September 2015 that I served a copy of the foregoing
Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period January 1, 2005 to the present, produce all contracts and agreements with towing companies (including, but not limited to contracts with G & C Gulf, Inc. d/b/a G&G Towing) entered into either by you or one of your affiliates, subsidiaries, parents, agents, assigns or employees for towing services in the State of Maryland.
2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND

or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Kensington Shopping Center

Issue Date: 08/26/2015

Name
15245 Shady Grove Rd., Suite 160

Service Deadline: 60 days after Issue Date.

Address
Rockville, MD 20850

City, County, State, Zip

SUBPOENA

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015

at 10:00

a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address

Towson, Maryland 21204

Phone

City, State, Zip

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If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code. Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
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3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
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 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

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QUAN-EN YANG, et al.
On His Own Behalf and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

G & C GULF, INC. d/b/a
G&G TOWING

Defendant.

* IN THE
* CIRCUIT COURT
* FOR
* MONTGOMERY COUNTY, MD.
* Case No. 403885-V
* Hon. Ronald B. Rubin
* Specially Assigned
* TRACK VI

* * * * *

**NOTICE OF DEPOSITION OF KENSINGTON SHOPPING CENTER
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Kensington Shopping Center
c/o Oculus Realty, LLC
Serve on: K. David Meit
15245 Shady Grove Rd.
Suite 160
Rockville, MD 20850

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By: 
Richard S. Gordon

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Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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2. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY
 50 Maryland Avenue, Rockville, Maryland 20850
 Phone: (240) 777-9400 Maryland Relay call: 711
 Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
 or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff

Defendant

TO: Decoverly IV Condominium Inc.

Issue Date: 08/26/2015

Name
9639 Doctor Perry Rd., Suite 208

Service Deadline: 60 days after Issue Date.

Address
Ijamsville, MD 21754

SUBPOENA

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street
 Address of court or other location

On October 1, 2015 at 10:00 a.m. or p.m.
 Date Time

Silver Spring, Maryland 20910
 City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

If this subpoena compels the production of financial information, or information derived from financial records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Fin. Inst. §1-304 and any other applicable law.

If this subpoena compels the production of medical records, the requestor of this subpoena hereby certifies having taken all necessary steps to comply with the requirements of Md. Code Ann., Health-Gen. §4-306 and any other applicable law.

Barbara H. Meiklejohn, Clerk
 Circuit Court for Montgomery County

NOTICE:

1. YOU ARE LIABLE TO BODY ATTACHMENT AND/OR FINE FOR FAILURE TO OBEY THIS SUBPOENA.
2. This subpoena is effective for the date and time stated and any subsequent dates as directed by the court.
3. If this subpoena is for attendance at a deposition and the party served is an organization, notice is hereby given that the organization must designate one or more persons who will testify on its behalf, pursuant to Rule 2-412(d).
4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

RETURN OF SERVICE

I certify that I delivered the original of this Subpoena to the following person(s): _____
 on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.

QUAN-EN YANG, et al.	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	
	*	FOR
Plaintiff,	*	
vs.	*	MONTGOMERY COUNTY, MD.
	*	
G & C GULF, INC. d/b/a	*	Case No. 403885-V
G&G TOWING	*	
	*	Hon. Ronald B. Rubin
Defendant.	*	Specially Assigned
	*	TRACK VI

* * * * *

NOTICE OF DEPOSITION OF DECOVERLY IV CONDOMINIUM, INC.
WITH SUBPOENA DUCES TECUM

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Decoverly IV Condominium, Inc.
 Serve on: Torin Andrews
 Andrews & Lawrence Law Group, LLC
 Ste. 208 South
 9639 Doctor Perry Rd.
 Ijamsville, MD 21754

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:



Richard S. Gordon

CERTIFICATE OF SERVICE

I hereby certify, this 1st day of September 2015 that I served a copy of the foregoing
Notice of Deposition by first-class mail, postage pre-paid, on the following:

Ronald S. Canter
The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850



Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.



CIRCUIT COURT FOR MONTGOMERY COUNTY

50 Maryland Avenue, Rockville, Maryland 20850
Phone: (240) 777-9400 Maryland Relay call: 711
Toll-free (in Maryland) 888-287-0593

Case No. 403885-V

STATE OF MARYLAND
or

QUAN-EN YANG

vs. G&C GULF d/b/a G&G TOWING

Plaintiff
TO: Middlebrook Commons Homeowners Association

Defendant
Issue Date: 08/26/2015

Name
20440 Century Blvd., Suite 100

Service Deadline: 60 days after Issue Date.

Address
Germantown, MD 20874

SUBPOENA

City, County, State, Zip

You are hereby compelled to appear at a court proceeding deposition at the following location:

Zipin, Amster & Greenberg, 836 Bonifant Street

On October 1, 2015 at 10:00 a.m. or p.m.

Address of court or other location

Date

Time

Silver Spring, Maryland 20910

City, State, Zip

To testify in the above case, and/or

To produce the following documents, items, and information, not privileged: Please see Attachment A.

To produce, permit inspection and copying of the following documents or other tangible items: _____

Plaintiff: Quan-En Yang

requested issuance of this subpoena. Questions should be referred to:

Requested By
Richard S. Gordon

102 W. Pennsylvania Ave. Suite 402

Name
(410) 825-2300

Address
Towson, Maryland 21204

Phone

City, State, Zip

Special Message: You do NOT have to appear for the Deposition if documents together with an Affidavit of Authenticity are produced prior to October 1, 2015. Please send documents to Richard S. Gordon.

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Barbara H. Meiklejohn, Clerk
Circuit Court for Montgomery County

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4. Serving or attempting to serve a subpoena more than 60 days after the date of issuance is prohibited.

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on the following date: _____ by the following method (specified as required by Rule 2-126): _____

Signature

Printed Name

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

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QUAN-EN YANG, et al.	*	IN THE
On His Own Behalf and on Behalf	*	CIRCUIT COURT
of All Others Similarly Situated,	*	
	*	FOR
Plaintiff,	*	MONTGOMERY COUNTY, MD.
vs.	*	
	*	Case No. 403885-V
G & C GULF, INC. d/b/a	*	
G&G TOWING	*	Hon. Ronald B. Rubin
	*	Specially Assigned
Defendant.	*	TRACK VI

* * * * *

**NOTICE OF DEPOSITION OF MIDDLEBROOK COMMONS
HOMEOWNERS ASSOCIATION
WITH SUBPOENA DUCES TECUM**

Please take notice that, pursuant to Maryland Rule of Civil Procedure 2-412, the Plaintiff, Quan-En Yang, will take the deposition, upon oral examination, of the person named below at the offices of Zipin, Amster & Greenberg, 836 Bonifant Street, Silver Spring, Maryland, 20910, or as may otherwise be agreed, on the date and the time indicated, for the purpose of discovery or as evidence or both, in the above-captioned action, before a person authorized to administer an oath according to the Rules of this Court.

DEPONENT: Custodian of Records of Middlebrook Commons
Homeowners Association
c/o The Management Group Associates, Inc.
Serve on: Kathy Drury, Secretary
20440 Century Blvd.
Suite 100
Germantown, MD 20874

DATE: October 1, 2015

TIME: 10:00 a.m.

The Deponent shall produce and bring with him the documents attached as

Attachment A.

Dated: September 1, 2015

Richard S. Gordon
rgordon@GWCfirm.com
Benjamin H. Carney
bcarney@GWCfirm.com
GORDON, WOLF & CARNEY, CHTD.
102 West Pennsylvania Ave., St. 402
Baltimore, Maryland 21204
(410) 825-2300
(410) 825-0066 (facsimile)

Attorneys for Named Plaintiff and the Class

By:


Richard S. Gordon

CERTIFICATE OF SERVICE

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Notice of Deposition by first-class mail, postage pre-paid, on the following:

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The Law Offices of Ronald S. Canter, LLC
200A Monroe Street, Suite 104
Rockville, Maryland 20850

Fredric J. Einhorn
77 S. Washington Street, Suite 206
Rockville, MD 20850


Richard S. Gordon

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. For the time period June 1, 2014 to the present, produce all records, logs, photographs, tow slips or other documents (whether in paper form or electronic) memorializing, identifying or documenting the vehicles that you have authorized or requested a towing company (including, but not limited to G & C Gulf, Inc. d/b/a G&G Towing) to tow from property(s) owned or managed by you in the State of Maryland.